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June 3, 2022

Via ECF

Hon. Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Jerez v. Goodwill Industries of Greater New York and Northern New Jersey, Inc.*
Case No. 20-cv-5875 (MKB)(RML)

Dear Judge Levy:

This firm is counsel for Plaintiff in the above-reference matter. We write, jointly with counsel for Defendants, to respectfully request an extension of the fact discovery deadline from June 6, 2022 to August 31, 2022.

The parties have been engaged in written discovery and document exchange, but need additional time to supplement production and conduct depositions. The parties anticipate the depositions to be scheduled in August due to a full calendar and conflicts in June and July, and therefore respectfully request an extension until August 31, 2022.

This is the parties' first request for an extension of the fact discovery deadline, and the requested extension does not affect any other scheduled dates. A status conference is currently scheduled for June 7, 2022 at 10:30 a.m.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Angela Kwon

cc: all parties via ECF